



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels, Jr.*

**Governor**

*Thomas W. Easterly*

**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

August 22, 2011

Mr. John Mundell  
Mundell & Associates  
110 South Downey Avenue  
Indianapolis, IN 46219

Re: Revised Work Plan for Third Round of  
CAP 18 ME Injections  
Michigan Plaza  
3801-3823 West Michigan Street  
Indianapolis, Indiana  
VRP #6061202

Dear Mr. Mundell:

This office has completed review of the Revised Work Plan for Third Round of CAP 18 ME Injections received July 22, 2011 for the Michigan Plaza facility in Indianapolis, Indiana. The work plan is approved for implementation. As stated in IDEM's June 22, 2011 letter, the vapor intrusion investigation needs to begin as soon as possible. IDEM has the following comments.

Comments:

1. The proposed monitoring wells need to be continuously logged and field screened. Also, the deep wells do not necessarily need 10 foot screens; 5 foot screens are appropriate. As stated in IDEM's March 30, 2011 letter, the new monitoring wells need to have baseline groundwater samples taken prior to the CAP 18 ME injections. The water levels should also be monitored during injections so that supporting data can be gathered to determine if the groundwater gradient is changing and potentially pushing contaminants in unexpected directions. After the injection event, these wells should again be sampled to determine changes in the aquifer from the injections.
2. As a reminder, bioremediation parameters (dissolved oxygen, iron, magnesium, sulfate, nitrates, etc.) along with the ethane, ethene, and methane parameters need to be analyzed quarterly. The bioremediation parameter data should be submitted to IDEM in quarterly reports.

Please notify IDEM when the monitoring wells will be installed so that representatives may be present. After the well installation, please again notify IDEM of the CAP 18 ME injection schedule. If you have any questions, please contact me at (317) 233-2991, (800) 451-6027, or at [ebrittai@idem.in.gov](mailto:ebrittai@idem.in.gov).

Sincerely,

Erin Brittain, Project Manager  
Voluntary Remediation Program  
Office of Land Quality